Bay Delta Conservation Plan/CA Water Fix
July 2015 – Public Draft RDEIR/SDEIS
CDFW Staff Comments
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Supplemental Document

The following provides a summary of CEQA conclusions (excerpts from Section 4 of the RDEIR/SEIS) in support of the general comment submitted as part of CDFW's comments on Section 4 fish and aquatic resources.

Under Alternative 4A, egg mortality (according to the Reclamation egg mortality model) in drier water years, during which winter-run Chinook salmon would already be stressed due to reduced flows and increased temperatures, would be up to 18% greater (absolute difference) than egg mortality under the CEQA baseline. The extent of spawning habitat and egg incubation conditions according to the SacEFT model are predicted to be 21% and 9% lower, respectively, on an absolute scale. Years with water temperatures at the red level of concern and exceedances above NMFS temperature thresholds would be substantially greater under Alternative 4A relative to the CEQA baseline. Therefore, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable spawning habitat and substantially reduce the number of winter-run as a result of egg mortality, although, due to the highly suppressed population size of winter-run Chinook salmon relative to historical population sizes, it is unlikely that spawning habitat is currently limiting. (Section 4, p. 4.3.7-60)

Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce juvenile migration conditions for winter-run Chinook salmon upstream of the Delta. Under Alternative 4A, there would be reductions in flow and increased temperatures in the Sacramento River that could lead to biologically meaningful reductions in juvenile migration conditions, thereby reducing survival relative to Existing Conditions. Reduced migration conditions would delay or eliminate successful migration necessary to complete the winter-run Chinook salmon life cycle. Winter-run Chinook salmon juvenile survival through the Delta for Alternative 4A would be similar or slightly lower than for Existing Conditions. (Section 4, p. 4.3.7-72)

Under Alternative 4A (including climate change effects), there are flow and storage reductions, as well as temperature increases in the Sacramento River that would lead to biologically meaningful increases in egg mortality and overall reduced habitat conditions for spawning spring-run and egg incubation, as compared to Existing Conditions. Flows in the Feather River low-flow channel do not differ between Alternative 4A and Existing Conditions. However, water temperature analyses in the Feather River low-flow channel using thresholds developed in coordination with NMFS indicate that there would be moderate to large negative effects on temperature conditions during spring-run Chinook salmon spawning and egg incubation. (Section 4, p. 4.3.7-98)

Under Alternative 4A, there would be small to moderate flow reductions and temperature increases in the Feather River. SacEFT predicts improvements to spawning habitat availability for spring-run Chinook salmon in the Sacramento River under Alternative 4A and SALMOD predict slightly reduced habitat conditions. Exceedances above NMFS temperature thresholds would be higher under Alternative 4A relative to Existing Conditions. Results would be similar among model scenarios. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce rearing habitat and substantially reduce the number of spring-run Chinook salmon as a result of fry and juvenile mortality. (Section 4, p. 4.3.7-109)

Under Alternative 4A, there would be moderate to substantial flow reductions and substantial increases in temperatures and temperature exceedances above thresholds in the Sacramento, Feather, and American Rivers, which would interfere with fall-/late fall--run Chinook salmon spawning and egg incubation. Biological models, including the Reclamation egg mortality model and SacEFT, predict substantially degraded spawning and egg incubation habitat conditions in the Sacramento, Feather, and American Rivers. These modeling results are generally consistent for H3_ELT and H4_ELT. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable spawning habitat and substantially reduce the number of fall-/late fall-run Chinook salmon as a result of egg mortality. (Section 4, p. 4.3.7-155)

Under Alternative 4A, including climate change effects, there would be persistent moderate flow reductions in the Feather, American, Stanislaus, Mokelumne, and San Joaquin Rivers, which would interfere with fall-/late fall--run Chinook salmon juvenile rearing habitat conditions. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable rearing habitat and substantially reduce the number of fall-/late fall-run Chinook salmon as a result of degraded juvenile rearing conditions. (Section 4, p. 4.3.7-167)

These modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce migration conditions for fall-/late fall-run Chinook salmon upstream of the Delta. Under Alternative 4A, instream flows would be lower in multiple upstream rivers during the fall-run Chinook salmon migration period relative to Existing Conditions, depending on scenario (H3_ELT or H4_ELT). Degraded migration habitat conditions would delay or eliminate successful migration necessary to complete the fall-run Chinook salmon life cycle. However, the impact of Alternative 4A across the operational range (Scenarios 23 H3_ELT and H4_ELT) on through-Delta migration conditions would be small due to generally similar juvenile survival and a minor effect on olfactory cues for adults. (Section 4, p. 4.3.7-192)

Under Alternative 4A, there are flow and cold water pool availability reductions in the Feather, American, and Stanislaus Rivers, as well as temperature increases in the Feather and American rivers that would lead to biologically meaningful increases in egg mortality and overall reduced habitat conditions for spawning steelhead and egg incubation, as compared to Existing Conditions. Alternative

4A would not have significant effects on steelhead spawning conditions in the Sacramento River, Clear Creek, San Joaquin River, or the Mokelumne River. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable spawning habitat and substantially reduce the number of steelhead as a result of egg mortality. (Section 4, p. 4.3.7-214)

Under Alternative 4A, there are flow reductions in the Feather, American, Stanislaus, San Joaquin, and Mokelumne Rivers and temperature increases in the Sacramento, Feather, American, and Stanislaus Rivers that would lead to reductions in quantity and quality of fry and juvenile steelhead rearing habitat relative to Existing Conditions. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce rearing habitat and substantially reduce the number of steelhead as a result of fry and juvenile mortality. (Section 4, p. 4.3.7-229)

Under Alternative 4A, there would be reductions in flow in the Sacramento, Feather, American, Stanislaus, and Mokelumne Rivers that would lead to biologically meaningful reductions in juvenile and adult migration conditions, thereby reducing survival relative to Existing Conditions. Reduced migration conditions would delay or eliminate successful migration necessary to complete the steelhead life cycle. Alternative 4A would not affect migration conditions for steelhead in Clear Creek or the San Joaquin River. Water temperatures under Alternative 4A would generally be similar to those under Existing Conditions in all rivers examined. There would be minimal effects on through-Delta migration conditions because changes in juvenile survival and adult olfactory cues would be small. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce migration conditions for steelhead. (Section 4, p. 4.3.7-253)

Under Alternative 4A, flows would generally not differ in the Sacramento River. However, flows would be lower under Alternative 4A in the Feather and San Joaquin rivers and water temperature conditions would be degraded in all rivers examined relative to Existing Conditions. Results would generally be consistent between H3 and H4. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable spawning habitat and substantially reduce the number of green sturgeon as a result of elevated exceedances above temperature thresholds. (Section 4, p. 4.3.7-294)

Under Alternative 4A, water temperatures would be similar in the Sacramento River, although the exceedance above NMFS temperature thresholds in the Feather River would be higher under Alternative 4A than those under the CEQA baseline, which could increase stress, mortality, and susceptibility to disease for larval and juvenile green sturgeon. These modeling results are consistent among scenarios. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce rearing habitat and substantially reduce the number of green sturgeon as a result of fry and juvenile mortality. (Section 4, p. 4.3.7-298)

Under Alternative 4A, there would be frequent small to large reductions in flows in the Sacramento and Feather Rivers upstream of the Delta that would reduce the ability of all three life stages of green sturgeon to migrate successfully. Exceedance of Delta outflow thresholds would be lower under Alternative 4A's H3_ELT scenario than under Existing Conditions, but would be similar or greater than under Existing Conditions for the H4_ELT scenario. Note that there is high uncertainty that year class strength is due to Delta outflow or if both year class strength and Delta outflows co-vary with another unknown factor. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce upstream migration conditions for green sturgeon. (Section 4, p. 4.3.7-303)

Under Alternative 4A, there would be small to moderate, persistent reductions in flows in the Sacramento, Feather, and San Joaquin Rivers that would cause biologically meaningful effects to white sturgeon spawning and egg incubation habitat. Further, there would be increases in exceedances of NMFS temperature thresholds in the Sacramento River that would cause a biologically meaningful effect to white sturgeon spawning and egg incubation. Results would generally be consistent between H3_ELT and H4_ELT. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce the quantity and quality of suitable spawning and egg incubation habitat. (Section 4, p. 4.3.7-325)

Under Alternative 4A, the exceedance of flow thresholds in the Sacramento River would be lower than under Existing Conditions. Exceedance of Delta outflow thresholds would be lower under Alternative 4A's H3_ELT scenario than under Existing Conditions, but would be similar or greater than under Existing Conditions for the H4_ELT scenario, although there is high uncertainty that year class strength is due to Delta outflow or if both year class strength and Delta outflows are co-varying with another unknown factor. Juvenile migration flows in the Sacramento River at Verona would be up to 31% lower in six (for H3_ELT) or seven (for H4_ELT) of 12 months relative to Existing Conditions. These reduced flows would have a substantial effect on the ability to migrate downstream, delaying or slowing rates of successful migration downstream and increasing the risk of mortality. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce migration conditions for white sturgeon. (Section 4, p. 4.3.7-326)

Collectively, these modeling results indicate that the impacts to Pacific lamprey spawning and egg incubation conditions would be less than significant. There would be no increases in exposure to redd dewatering that would affect more than 5 percent of the population in all rivers. Temperature exposure in the American River at the Sacramento River confluence would affect 15 percent more cohorts under H3_ELT, but there would be no other differences that would have a biologically meaningful effect to Pacific lamprey in any of the other 9 locations evaluated. Therefore, the impact is less than significant and no mitigation is required. (Section 4, p. 4.3.7-336)

Under Alternative 4A, the risk of redd dewatering would increase to some degree under some flow

reductions in the Sacramento and Trinity rivers, and substantially in the American River at Nimbus Dam (increases from 34% to 238%). Flow reductions would increase the risk of ammocoete stranding and desiccation in these rivers. There would be a beneficial effect from decreased occurrence of flow reduction events (=reduced ammocoete stranding risk) in the Feather River (-8 19% to -64% for the 85% and 90% flow reduction categories) but this effect would not offset the more substantial reductions in the other locations. There would be an increase in exposure to critical water temperatures in most locations examined. Increased exposure to higher water temperatures would increase stress and mortality of ammocoetes. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce rearing habitat and substantially reduce the number of Pacific lamprey as a result of fry and juvenile mortality. (Section 4, p. 4.3.7-343)

Collectively, these modeling results indicate that the effect is less than significant because it would not substantially reduce or degrade migration habitat or substantially reduce the number of fish as a result of mortality. There would be small to moderate negative effects of Alternative 4A on lamprey migration flows in the Sacramento River at Rio Vista, no effect (under H3_ELT) or moderately large benefits (under H4_ELT) in the Feather River, and no effect in the Sacramento River at Red Bluff and in the American River. Combined, these effects would not have a population level effect on Pacific lamprey. Therefore, the impact is less than significant and no mitigation is required. (Section 4, p. 4.3.7-348)

Under Alternative 4A, there would be moderate to substantial persistent increases in occurrence of flow reduction events for Alternative 4A with respect to Existing Conditions for the Trinity River (up 17 to 49%) and the American River at Nimbus Dam (up to 292%) and at the confluence with the Sacramento River (up to 270%) that would increase river lamprey ammocoete stranding risk and therefore rearing success for these locations. There would be a beneficial effect from reduced occurrence of flow reductions in the Feather River (up to 61% reduction) but this effect would not be sufficient to offset the negative effects from increased occurrence of flow reductions at the other locations. Further, stranding risk under H4_ELT in the Feather River would be higher than those under H3_ELT, such that the benefits under H3_ELT would not occur under these H4_ELT. There would also be increases under Alternative 4A in ammocoete cohort exposure to critical water temperatures in the Feather and American rivers that would have effects on rearing success through ammocoete mortality. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce rearing habitat and substantially reduce the number of river lamprey as a result of fry and juvenile mortality. (Section 4, p. 4.3.7-364)

Under Alternative 4A, there would be moderate and persistent flow reductions for substantial portions of the river lamprey macropthalmia migration period in the American River, and less persistent and smaller magnitude flow reductions in the Sacramento River and Feather River. These flow reductions would affect juvenile migration success, increase straying, and delay access to the ocean. If in fact, lamprey use these cues to find natal spawning grounds, these flow reductions may also affect adult migration success, including a reduction in the ability for adults to sense olfactory cues. There would be beneficial effects from increases in flow for some months and water year types in each location.

However, this effect would not be sufficient to offset the negative effects of flow reductions for the remainder of the migration period and/or in other water year types, particularly drier water year types when effects of flow reductions would be more critical. Flows under H4_ELT would be less favorable than those under H3_ELT. Contrary to the NEPA conclusion set forth above, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce migration conditions for river lamprey. (Section 4, p. 4.3.7-367)

Collectively, flows would be lower under Alternative 4A during the adult largemouth bass residency period relative to Existing Conditions. Flows would be persistently and moderately to substantially lower in several rivers during substantial portions of the period. Therefore, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce the quantity and quality of habitat for adults as a result of flow reductions. (Section 4, p. 4.3.7-416)

Collectively, flows would be lower under Alternative 4A during the juvenile and adult Sacramento tule perch occurrence period relative to Existing Conditions. Flows would be persistently and moderately to substantially lower in several rivers during substantial portions of the period. Therefore, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable rearing habitat as a result of flow reductions. (Section 4, p. 4.3.7-423)

Collectively, flows would be lower under Alternative 4A during the year-round juvenile and adult Sacramento-San Joaquin roach occurrence period relative to Existing Conditions. Flows would be persistently and moderately to substantially lower in several rivers during substantial portions of the rearing period. Therefore, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce suitable rearing habitat as a result of flow reductions. (Section 4, p. 4.3.7-430)

Collectively, flows would be lower under Alternative 4A during the juvenile and adult hardhead occurrence period relative to Existing Conditions. Flows would be persistently and moderately to substantially lower in several rivers during substantial portions of the rearing period. Therefore, these modeling results indicate that the difference between Existing Conditions and Alternative 4A could be significant because the alternative could substantially reduce habitat for juvenile and adult hardhead as a result of flow reductions. (Section 4, p. 4.3.7-436)